

Job # 42986

Johnson et al v Holmes
Jenny Zawitz

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

BIANCA JOHNSON and
DELMAR CANADA,
Plaintiffs,

vs. Case No. 3:16cv16

ANDREW HOMES, JOHN DOES 1-3,
and ALBEMARLE COUNTY,

ORIGINAL

Defendants.

ZOOM VIDEO CONFERENCE
DEPOSITION OF JENNIFER ZAWITZ
2:00 p.m. - 2:22 p.m.
July 14, 2020

Job No. 42986

REPORTED BY: Darlene Joy Owings, CCR

1 A. Sure. So usually what would happen,
2 officers would come in or other staff members of
3 the police department would come in. They'd give
4 me a set of parameters. I'd pull the data they
5 requested, and then give that to them, whatever
6 they requested.

7 Q. And that essentially was your
8 function --

9 A. Yes, sir.

10 Q. -- for the period of time you worked
11 there?

12 A. Yes, sir.

13 Q. So looking at what is now Exhibit 1, do
14 you recognize that document?

15 A. It looks like something I would have
16 prepared, yes, sir.

17 Q. Explain to me why you think it's
18 something that you would have prepared.

19 A. The formatting looks like our standard
20 formatting. At the bottom it looks like the way
21 that we would have formatted it. It's extracted
22 from the RMS, and the date it was extracted.

23 Q. Okay. And who asked you, if you can
24 recall, to prepare this document?

25 A. I don't recall, sir. I apologize.

1 format rather than the substance?

2 A. Yes, sir, that's right.

3 Q. Do you know what this chart represents?
4 It says at the top citations.

5 Now what does the word citations mean
6 in your parlance?

7 A. That can mean a variety of things. It
8 could mean citations for traffic offense. It
9 could mean citations for drug offenses. It could
10 mean a variety of citations that people would
11 write.

12 Q. Do you know what it means on this
13 particular chart?

14 A. I don't, sir. I'm sorry.

15 Q. Would somebody have asked you for a
16 chart like this for citations that would have
17 covered all of the different citations that you
18 just mentioned?

19 A. It's possible, yes, sir.

20 Q. What else is possible?

21 A. If they wanted a specific type of
22 citation they could have requested that. But I
23 don't know. I'm sorry.

24 Q. I take it you don't recall what you
25 were asked?